

Message

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAAACC-TKRASNIC]
Sent: 10/10/2018 8:30:25 PM
To: Hude, Nathaniel (DEQ) [HudeN@michigan.gov]
CC: Rogers, Chad (DEQ) [ROGERSC1@michigan.gov]; Schinderle, Jack (DEQ) [SCHINDERLEJ@michigan.gov]; Newman, Erin [newman.erin@epa.gov]
Subject: RE: 40CFR721 Subpart E question
Attachments: CDR_PFAS in Michigan.xlsx

Hi Nathan,

Please find attached a CDR report on companies that reported manufacture (including import), processing, or use of PFAS chemicals in Michigan.

Please note that the reporting is based on whether site-specific production volume met or exceeded 25,000 pounds during any calendar year between 2012 and 2015, and for chemicals subject to certain TSCA actions, the production volume exceeding 2,500 pounds. Given the relatively high reporting thresholds, and the small business exemption for CDR reporting, most of the users of PFAS would not be subject to reporting because of the small volume of PFAS used (e.g. chrome plating).

The CDR database is available to download at <https://www.epa.gov/chemical-data-reporting>. Data dictionary (which includes reporting requirements) is available at <https://www.epa.gov/chemical-data-reporting/2016-chemical-data-reporting-results>.

If you have any additional questions about CDR reporting or the attached report, please contact Stephanie Jarmul (jarmul.stephanie@epa.gov; 202-564-6130).

I hope this is helpful and please let me know if any other questions.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Hude, Nathaniel (DEQ) [mailto:HudeN@michigan.gov]
Sent: Thursday, October 04, 2018 9:52 AM
To: Krasnic, Toni <krasnic.toni@epa.gov>
Cc: Rogers, Chad (DEQ) <ROGERSC1@michigan.gov>; Schinderle, Jack (DEQ) <SCHINDERLEJ@michigan.gov>; Newman, Erin <newman.erin@epa.gov>
Subject: RE: 40CFR721 Subpart E question

Thank you Toni!

Erin- to answer your question, we are not sure of the substitutes until we can see what is being brought in, who is using it, and for what purpose. Once that is figured out we're hoping to get industry involved with finding alternatives. Hopefully that answers your question.

Thank you!

Nathan Hude
www.michigan.gov/p2integratedassessment
Pollution Prevention and Stewardship Unit, WRMPD
Department of Environmental Quality
P.O. Box 30241, 525 West Allegan Street
Lansing, MI 48909-7741
Phone: 517-285-7847
Email: huden@michigan.gov

From: Krasnic, Toni <krasnic.toni@epa.gov>
Sent: Thursday, October 04, 2018 9:02 AM
To: Hude, Nathaniel (DEQ) <HudeN@michigan.gov>
Cc: Rogers, Chad (DEQ) <ROGERS1@michigan.gov>; Schinderle, Jack (DEQ) <SCHINDERLEJ@michigan.gov>; Newman, Erin <newman.erin@epa.gov>
Subject: RE: 40CFR721 Subpart E question

Nathan and Erin,

I'll work on pulling CDR data for Michigan and hope to get it done by end of next week.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Newman, Erin
Sent: Wednesday, October 03, 2018 2:34 PM
To: Hude, Nathaniel (DEQ) <HudeN@michigan.gov>
Cc: Krasnic, Toni <krasnic.toni@epa.gov>; Rogers, Chad (DEQ) <ROGERS1@michigan.gov>; Schinderle, Jack (DEQ) <SCHINDERLEJ@michigan.gov>
Subject: RE: 40CFR721 Subpart E question

Hi Nathan,

I'm sorry – I missed your first email. I will have to look into this further and get back to you. I'm in the air program here in Region 5 and I'm probably not the best contact to answer your questions. Let me ask around.

What type of products are you considering for substitutes?

Erin

From: Hude, Nathaniel (DEQ) [<mailto:HudeN@michigan.gov>]
Sent: Wednesday, October 03, 2018 7:37 AM
To: Newman, Erin <newman.erin@epa.gov>
Cc: Krasnic, Toni <krasnic.toni@epa.gov>; Rogers, Chad (DEQ) <ROGERS1@michigan.gov>; Schinderle, Jack (DEQ) <SCHINDERLEJ@michigan.gov>
Subject: RE: 40CFR721 Subpart E question

Hi Erin,

I just wanted to follow-up on this email. Is this something you could assist us with?

Thanks,

Nathan Hude

www.michigan.gov/p2integratedassessment

Pollution Prevention and Stewardship Unit, WRMPD

Department of Environmental Quality

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From: Hude, Nathaniel (DEQ)

Sent: Friday, September 28, 2018 11:15 AM

To: 'newman.erin@epa.gov' <newman.erin@epa.gov>

Cc: 'krasnic.toni@epa.gov' <krasnic.toni@epa.gov>; Rogers, Chad (DEQ) <ROGERSC1@michigan.gov>; Schinderle, Jack (DEQ) <SCHINDERLEJ@michigan.gov>

Subject: FW: 40CFR721 Subpart E question

Hi Erin,

Toni Krasnic suggested I contact you regarding some questions we have. As you know, Michigan is dealing with PFAS contamination throughout our state. We're continuing to research and identify industrial uses that could lead to further contamination and hoping to provide product substitution for industry. Our Pollution Prevention and Sustainability Unit has taken on this task.

40CFR721 Subpart E, requires the reporting of manufacturing, importing, or processing the chemicals listed in tables 1, 2, 3, and 4. According to Toni, the only businesses listed as reporting in accordance with this CFR are Arkema, Asahi, BASF Corporation (successor to Ciba), Clariant, Daikin, 3M/Dyneon, DuPont, and Solvay Solexis whom were the participating companies listed in the 2006 PFOA Stewardship Program.

Can you tell me if there is a way to identify companies in Michigan that use and of the compounds listed in Tables 1-4 of 40CFR721 Subpart E? Toni stated you may have CDR information on this. If not, is there another way of identifying companies that use/process/import these chemicals in Michigan?

Our current process is to identify users through water testing and or researching very vague SDS's. We are hoping there is a better way to perform this research due to the time it is taking and hopefully provide assistance in product substitution for the businesses identified.

Thank you,

Nathan Hude

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Phone: 517-285-7847

Email: huden@michigan.gov

From: Hude, Nathaniel (DEQ)
Sent: Friday, September 28, 2018 10:34 AM
To: 'krasnic.toni@epa.gov' <krasnic.toni@epa.gov>
Cc: Rogers, Chad (DEQ) <ROGERS1@michigan.gov>; Schinderle, Jack (DEQ) <SCHINDERLEJ@michigan.gov>
Subject: 40CFR721 Subpart E question

Good morning Toni,

As you may know, Michigan is dealing with PFAS contamination throughout our state. We're continuing to research and identify industrial uses that could lead to further contamination and hoping to provide product substitution for industry. Our Pollution Prevention and Sustainability Unit has taken on this task.

In 40CFR721 Subpart E, there are reporting requirements for companies manufacturing, importing, or processing the chemicals listed in tables 1, 2, 3, and 4.

Can you please provide us information on which companies in Michigan have reported IAW this CFR?

I will follow-up this email with a phone call as well.

Thank you for your time,

Nathan Hude
www.michigan.gov/p2integratedassessment
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